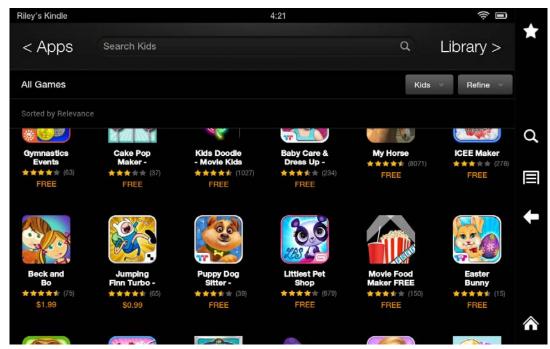
1 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 2 3 FEDERAL TRADE COMMISSION, Case No. 2:14-cv-01038-JCC 4 Plaintiff, **DECLARATION OF PATRICK** 5 EAGAN-VAN METER 6 v. 7 AMAZON.COM, INC., 8 Defendant. 9 10 11 I, Patrick Eagan-Van Meter, pursuant to 28 U.S.C. § 1746, have personal knowledge of 12 the facts set forth below. If called as a witness, I could and would testify competently as follows: 13 I am a citizen of the United States and over the age of eighteen (18) years old. I am employed as a program specialist with the Federal Trade Commission ("FTC") in the 14 Division of Financial Practices. My office address is 600 Pennsylvania Avenue, N.W., CC-15 10232, Washington, D.C., 20580. 16 2. I began working at the FTC in August of 2011. My responsibilities include 17 investigating suspected violations of consumer protection laws. In the normal course of carrying 18 out my investigative responsibilities, I regularly use electronic databases, mobile devices, and 19 software to capture screenshots from mobile devices and the Internet. 20 3. On or around March 2014, I was assigned as document custodian to the 21 investigation of Amazon.com, Inc. ("Amazon"). As part of my responsibilities on the FTC's 22 investigation of Amazon, I used Amazon's Kindle Fire device to download apps from the 23 Amazon Appstore, incur in-app charges through those apps, and capture screenshots of the app 24 download and in-app charge processes. I also reviewed certain documents produced by Amazon, 25 including in preparing this declaration. 26 DECLARATION OF PATRICK EAGAN-VAN METER Federal Trade Commission Case No. 2:14-cv-01038-JCC

5. For purposes of this declaration, unless otherwise noted, the relevant time period is November 15, 2011 through June 3, 2014. Also, unless otherwise noted, I created the screenshots included in this declaration by using a tool called "Droid@screen" to take screenshots. I saved each of these screenshots as a PNG file. Finally, I compared the screenshots that I took with the device screens that I had seen and verified that the screenshots accurately reflected the device screens that I encountered.

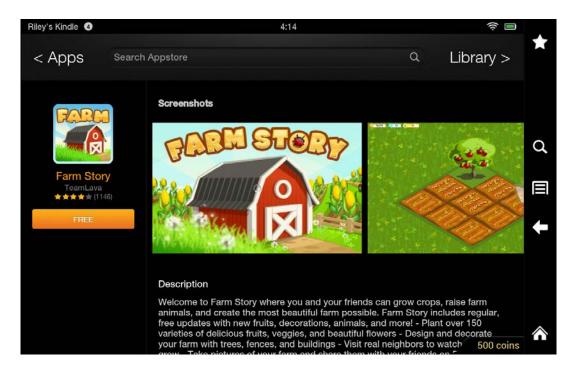
#### **Installing an App from the Amazon Appstore**

6. To install an app, users must locate that app in the Amazon Appstore by searching for it by keyword or browsing the categories in the Amazon Appstore. Amazon displayed app search results in rows, with the app icon, name of the app, a user rating, and the price of the app. Answer ¶ 13. An example screenshot, captured by former FTC employee Andrew Hasty, ¹ of a Kindle Fire while searching for the keyword "kids" is below:



<sup>&</sup>lt;sup>1</sup> See Exhibit A, Declaration of Andrew Hasty.

7. Users can install apps from the Amazon Appstore from an app's detail page. Dkt. 15 ¶¶ 14, 16. An example of an app detail page from before June 2013 is below. Other examples are attached hereto as **Exhibit B.** $^2$ 

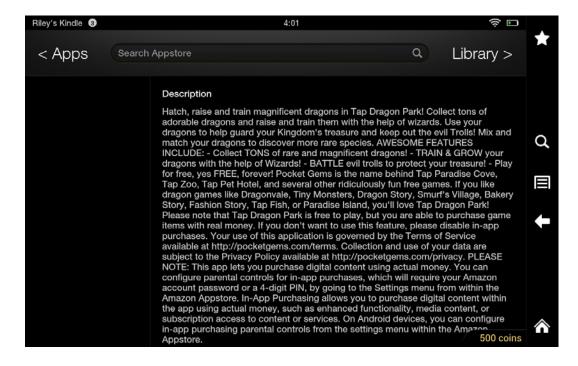


- 8. On each app's detail page, there has been a button labeled either "FREE" or a specific dollar amount (the "price button"). Dkt. 15 ¶ 16. The price button is located in a header that appears at the top of the screen if the device is held vertically, or in a column on the left-hand side of the screen if the device is held horizontally (the "installation section").
- 9. If an app has been free to install, the price button has said "FREE," regardless of whether the app contained in-app charges. *See id*. If the app cost a specific dollar amount to install, the price button has listed that specific dollar amount, regardless of whether the app contained in-app charges. *Id*.

<sup>&</sup>lt;sup>2</sup> Screenshots in this exhibit include captures done by former FTC employee Andrew Hasty. *See* Exhibit A.

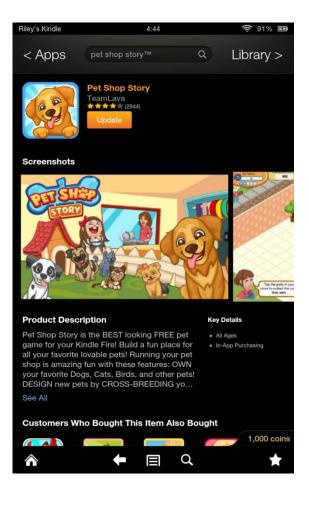
- 10. The price button has not contained any information about in-app charges, regardless of whether the app contained in-app charges. *Id.*; Exhibit 188 at Amazon\_00008749.
- 11. Adjacent to the price button, in the installation section, Amazon has displayed other information relating to the app, including the name of the app, the name of the app developer, and the app's rating. Dkt. 15 ¶ 14.
- 12. Amazon has not displayed any information about in-app charges in the installation section adjacent to the price button. *Id.* ¶¶ 14-15.
- 13. In addition to the price button and the information displayed adjacent to the price button in the installation section, an app's detail page has included content such as gameplay screenshots and an app description. *Id.* 15  $\P$  14. Screenshots appear below the installation section if the device is held vertically and to the right of the installation section if the device is held horizontally.
- 14. An app's detail page has included content (including portions of the developer-provided app description) that has appeared "below the fold"—that is, visible only if a user scrolls down the page or expands the content by clicking on "Read More" or "See All." *Id.* 15 ¶ 14; Exhibit 188 at Amazon\_00008763-4, Amazon\_00008794-5, Amazon\_00008819-20, Amazon\_00008828-9, Amazon\_00008841-2, Amazon\_00008868-9.
- 15. App detail pages within the Amazon Appstore have included a note at the end of the app description that mentioned in-app charges (the "Note"). *Id.* 15 ¶¶ 14 15. An example of an app detail page,<sup>3</sup> as captured by former FTC employee Andrew Hasty, from before June 2013 that has been scrolled to display the Note is below:

<sup>&</sup>lt;sup>3</sup> See Exhibit A, Declaration of Andrew Hasty.



- 16. The Note has appeared in the same font and color as the app description. Exhibit 188 at Amazon\_00008749, Amazon\_00008764, Amazon\_00008778, Amazon\_00008795, Amazon\_00008820, Amazon\_00008829, Amazon\_00008842, Amazon\_00008869.
- 17. Screenshots of the Note, which has not stated that consumers can incur in-app charges without entry of a password or Personal Identification Number (PIN), include Exhibit 188 at Amazon\_00008749, Amazon\_00008764, Amazon\_00008778, Amazon\_00008795, Amazon\_00008820, Amazon\_00008829, Amazon\_00008842, Amazon\_00008869.
- 18. Screenshots of the Note, which has not stated that consumers must change their device settings to prevent children from incurring in-app charges without entry of a password or a PIN, include Exhibit 188 at Amazon\_00008749-50, Amazon\_00008764, Amazon\_00008778, Amazon\_00008795, Amazon\_00008820, Amazon\_00008829, Amazon\_00008842, Amazon\_00008869.
- 19. In June 2013, below the installation section and below the screenshots, Amazon began including a bulleted list of items on the right-hand side of an app's detail page under the title "Key Details" (the "badge"). Dkt. 15 ¶ 15. Amazon did not make this change on its first-

generation Kindle Fire device, *e.g.*, Exhibit 188 at Amazon\_00008749. An example of an app detail page including a badge follows:



- 20. The badge has included items such as "All Ages" or "In-App Purchasing" or "Game Circle" or "Guidance Suggested" or "High Bandwidth" or "Mature." Exhibit 188 at Amazon\_00008763, Amazon\_00008777, Amazon\_00008794, Amazon\_00008828, Amazon\_00008841, Amazon\_00008868.
- 21. The words "In-App Purchasing," if they appear in the badge, appear in smaller font than other text on the page, including the app description.

DECLARATION OF PATRICK EAGAN-VAN METER Case No. 2:14-cv-01038-JCC

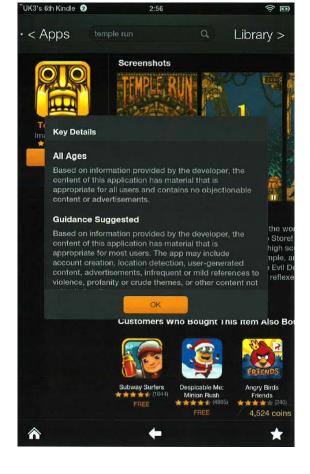
Federal Trade Commission 600 Pennsylvania Avenue N.W. Washington, DC 20580 (202) 326-3231

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1	22. As initially displayed on an app's detail page, the badge has not defined "In-App
2	Purchasing." Exhibit 188 at Amazon_00008763, Amazon_00008777, Amazon_00008794,
3	Amazon_00008828, Amazon_00008841, Amazon_00008868.
4	23. The badge has appeared in the same color as other text on the app's detail page,
5	including the app description. Exhibit 188 at Amazon_00008763, Amazon_00008777,
6	Amazon_00008794, Amazon_00008828, Amazon_00008841, Amazon_00008868.
7	24. The badge has not appeared in the same color or format as other hyperlinked text
8	on the app's detail page. Ex. 188 at Amazon_00008763, Amazon_00008777,
9	Amazon_00008794, Amazon_00008828, Amazon_00008841, Amazon_00008868.
10	25. If a consumer were to click the badge, a popup would have appeared (the "badge
11	popup"). Ex. 188 at Amazon_00008780-1, Amazon_00008796-7, Amazon_00008830-1,
12	Amazon_00008843-4, Amazon_00008870-1. An example of the badge popup <sup>4</sup> as it first appears
13	follows:
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25	<sup>4</sup> Screenshot produced by Amazon. Ex. 188 at Amazon_00008796.
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DECLARATION OF PATRICK EAGAN-VAN METER Case No. 2:14-cv-01038-JCC

Federal Trade Commission 600 Pennsylvania Avenue N.W. Washington, DC 20580 (202) 326-3231



- 26. The badge popup includes an expanded description of the "Key Details" that can appear in the badge, including:
  - Age ratings (e.g., "All Ages", "Guidance Suggested");
  - "In-App Purchasing"; and
  - "High Bandwidth Required".

Exhibit 188 at Amazon\_00008780-1, Amazon\_00008796-7, Amazon\_00008830-1, Amazon\_00008843-4, Amazon\_00008870-1.

27. The section of the badge popup related to "In-App Purchasing" has appeared below the fold, such that a consumer viewing the badge popup would have to scroll to see it. Exhibit 188 at Amazon\_00008780-1, Amazon\_00008796-7, Amazon\_00008830-1,

Amazon\_00008843-4, Amazon\_00008870-1. An example of a badge popup<sup>5</sup> scrolled to the section about "In-App Purchasing" follows:

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\*\*Coreenshots\*\*

\*\*Screenshots\*\*

\*\*Screenshots\*\*

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\*\*Screenshots\*\*

\*\*In-App Purchasing\*\*

In-App Purchasing allows you to purchase items within the app using actual money, such as enhanced functionality, media content, or subscription access to content or services. On Android devices, you can configure in-app purchasing parental controls from the settings menu within the Amazon Appstore.

\*\*High Bandwidth Required\*\*

This game uses streaming technology and requires a stable, high bandwidth connection. Playing this game on stable, high bandwidth connection.

28. Screenshots of the badge popup, which has not stated that consumers can incur inapp charges without entry of any account holder information, such as a password or Personal Identification Number (PIN), include Exhibit 188 at Amazon\_00008780-1, Amazon\_00008796-7, Amazon\_00008830-1, Amazon\_00008843-4, Amazon\_00008870-1. The badge popup has not stated that consumers must change their device settings to prevent children from incurring in-app charges without entry of a password or a Personal Identification Number (PIN). Exhibit 188 at

<sup>&</sup>lt;sup>5</sup> Screenshot produced by Amazon. Exhibit 188 at Amazon\_00008797.

1	Amazon_00008780-1, Amazon_00008796-7, Amazon_00008830-1, Amazon_00008843-4,
2	Amazon_00008870-1.
3	29. On the app detail page, Amazon has not disclosed to consumers that they can
4	incur in-app charges without entry of any account holder information, such as a password or
5	PIN. Exhibit 188 Amazon_00008749-50, Amazon_00008763-5, Amazon_00008777-9,
6	Amazon_00008794-5, Amazon_00008819-21, Amazon_00008828-9, Amazon_00008841-2,
7	Amazon_00008868-9.
8	30. To install an app, consumers have not had to review all content on an app's detail
9	page. Exhibit 188 at Amazon_00008763, Amazon_00008777, Amazon_00008794,
10	Amazon_00008819, Amazon_00008868.
11	31. To install an app, consumers have not had to scroll down and read the entirety of
12	an app's detail page. Exhibit 188 at Amazon_00008763, Amazon_00008777,
13	Amazon_00008794, Amazon_00008819, Amazon_00008868.
14	32. To install an app, consumers have not had to click "Read More" or "See All" on
15	an app's detail page. Exhibit 188 at Amazon_00008763, Amazon_00008777,
16	Amazon_00008794, Amazon_00008819, Amazon_00008868.
17	33. To install an app, consumers have not had to click the badge. Exhibit 188 at
18	Amazon_00008763, Amazon_00008777, Amazon_00008794, Amazon_00008868.
19	34. To install an app, consumers have had to press the price button. Dkt. 15 \( \Pi \) 16. If a
20	consumer pressed the price button, Amazon would have replaced the text on the button with the
21	words "Get App." <i>Id</i> . To continue app installation, consumers have had to press the price button
22	a second time.
23	35. Before June 2013, as detailed in paragraphs 6 to 18 above, consumers could have
24	installed apps from the Amazon Appstore without any information about in-app charges being
25	visible on consumers' screens.
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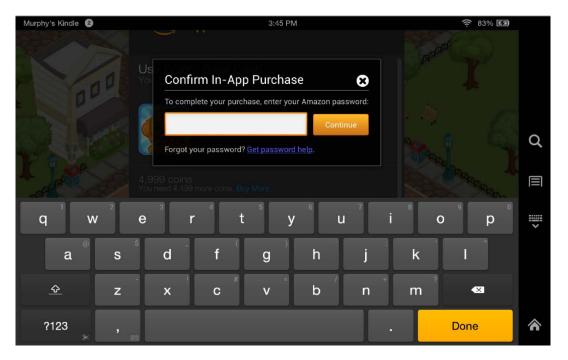
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36. After June 2013, as detailed in paragraphs 19 to 34 above, consumers could have installed apps from the Amazon Appstore without any information about in-app charges becoming visible on consumers' screens, apart from the words "In-App Purchasing."

#### **Incurring In-App Charges**

- 37. Many children's apps from the Amazon Appstore have featured virtual items acquirable for virtual currency, with no real monetary cost. Dkt. 15 ¶¶ 24 26. Examples of virtual in-app items paid for with virtual currency include a sea turtle, a hamster, and gold coins.
- 38. Many of children's apps from the Amazon Appstore have featured virtual items that cost real money to acquire. Dkt. 15 ¶¶ 24 26. Examples of virtual in-app items billed to the account holder's Amazon account include a boatload of doughnuts, a can of stars, and bars of gold.
- 39. If a user has engaged in an activity associated with an in-app charge (e.g., clicking a button to acquire virtual items for use in a game), Amazon has displayed a popup containing the amount of the charge (the "charge popup"). Dkt. 15 ¶ 18.
- 40. The charge popup contained a button labeled "Get Item" (the "get button") that users had to press to obtain the in-app item. Dkt.  $15 \, \P \, 18$ .
- 41. Until March 2012, Amazon's default in-app charge process was such that if a user pressed the get button, Amazon billed the charge to the account holder. Dkt. 15 ¶ 18-20.
- 42. In March 2012, Amazon began requiring password entry to confirm individual inapp charges of at least \$20. Dkt. 15  $\P$  20.
- 43. To my knowledge, Amazon did not add any other password requirements until February 2013.
- 44. Between February and May 2013, Amazon modified the occasions on which password prompts would appear before an in-app charge could be incurred multiple times. Dkt. 15 ¶ 21.

45. The caption of the password prompts described in paragraph 42 often read "Confirm In-App Purchase." Dkt. 15 ¶ 22; Ex. 188 at Amazon\_00008783, Amazon\_00008817, Amazon\_00008836. An example of a password prompt that Amazon displayed before June 2014 is below. Other examples are attached as **Exhibit C**.



- 46. Password entry in response to the prompts described in paragraph 45 has opened a billing window ranging from fifteen minutes to an hour. Dkt. 15 ¶ 21.
- 47. In or around May 2013, Amazon began displaying a password prompt for the first in-app charge incurred on a device (other than its first-generation devices). An example of the password prompt<sup>6</sup> that Amazon displayed beginning in or around May 2013 is below.

<sup>&</sup>lt;sup>6</sup> Screenshot produced by Amazon. Exhibit 188 at Amazon 00008833.

This app contains in-app purchasing, which allows you to buy items inside the

If you'd like to require a password for future in-app purchases, please turn on

To complete your purchase, enter your Amazon password:

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Confirm In-App Purchase

Forgot your password? Get password help

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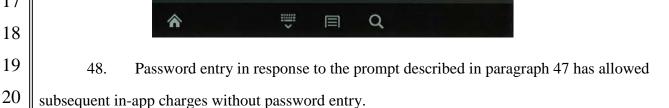
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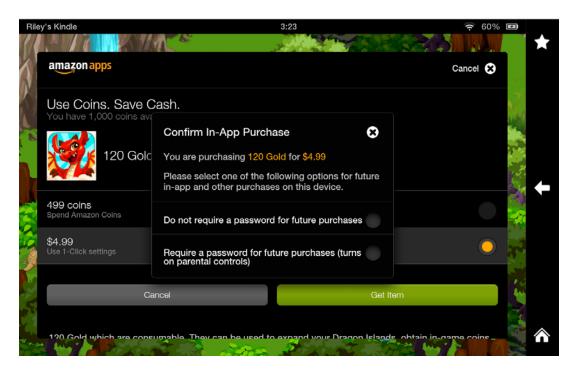
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49. Amazon continued to bill for certain in-app charges without requiring password entry, including in-app charges within the billing window described in paragraph 46 and any purchases less than \$20. Dkt. 15 ¶¶ 20-21.

50. In June 2014, shortly before the FTC filed its lawsuit, Amazon began presenting users of its newer devices (other than first-generation Kindle Fire devices) who had not previously incurred an in-app charge with a prompt asking them to choose whether to be prompted for a password for subsequent in-app charges. Exhibit 188 at Amazon\_00008799. A screenshot of the prompt added in June 2014 is below:



I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2<sup>nd</sup> day of February 2016.

Patrick Eagan-Van Meter

DECLARATION OF PATRICK EAGAN-VAN METER Case No. 2:14-cv-01038-JCC

Federal Trade Commission 600 Pennsylvania Avenue N.W. Washington, DC 20580 (202) 326-3231

# EXHIBIT A

#### DECLARATION OF ANDREW E. HASTY PURSUANT TO 28 U.S.C. § 1746

I, Andrew E. Hasty, hereby state that I have personal knowledge of the facts set forth below and am competent to testify about them. If called as a witness, I could and would testify as follows:

- 1. My name is Andrew E. Hasty. I am over the age of eighteen years old. I am employed by the Federal Trade Commission ("FTC") as a program specialist in the FTC's Office of Technology Research and Investigation in Washington, D.C.
- 2. I began working at the FTC in August 2008. As part of my work, I research and investigate persons and entities that may be violating the FTC Act and other federal statutes enforced by the Commission. In the normal course of my investigative and research duties, I frequently use different search engines and review public websites and app stores to obtain information about companies, individuals, and mobile applications. I also use a variety of other computer-based investigative tools to carry out FTC duties, including capturing screenshots on computers and mobile devices.
- 3. On April 18, 2013, I navigated to the Amazon app store on a Kindle Fire, selected to view the page for "Games," and then selected "All Games." On the resulting screen, I tapped "All Categories" and then the "Kids" category. This caused a list of apps to be displayed on the Kindle Fire's screen. From this list of apps, I tapped on "Baby Care & Dress Up." This displayed a details page for the app, including a button marked "FREE." From the details page, I tapped on the button marked "FREE" and then tapped on "Get App." Once the app finished installing, I tapped on the button marked "Open." This caused the app to launch. After the app finished launching, I returned to the app's details page in the Kindle Fire's app store. In order to document the device screens that I encountered, I used a debugging tool called ddms.bat to take

screenshots at each step described above. I saved each of these screenshots as a PNG file.

Finally, I compared the screenshots that I took with the device screens that I had seen and verified that the screenshots accurately reflected the device screens that I encountered. Attached as Exhibit A is a true and correct copy of screenshots from this set of captures.

4. On April 18, 2013, I navigated to the Amazon app store on a Kindle Fire and searched for apps using the query "kids games." I tapped on the first result, an app called "Animal Hide and Seek: Free Hidden Object Game for Kids," which took me to the app's details page. The details page included a button labeled "Free." I pressed the button labeled "Free" and then pressed the button labeled "Get App." This caused the app to be downloaded to the Kindle Fire. I launched the app when it finished downloading to ensure the app downloaded successfully and then navigated back to the app's details page in the app store. In order to document the device screens that I encountered, I used a debugging tool called ddms.bat to take screenshots at each step described above. I saved each of these screenshots as a PNG file. Finally, I compared the screenshots that I took with the device screens that I had seen and verified that the screenshots accurately reflected the device screens that I encountered. Attached as Exhibit B is a true and correct copy of screenshots from this set of captures.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this \_\_\_\_\_ day of May, 2015, in Washington, DC.

Andrew E. Hasty

# EXHIBIT A



Refine







## Search All Games



**All Categories** 

# Library >



Sorted by Relevance



**WarGames:** WOPR **★★★★** (87) \$1.99



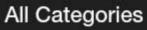
**Hungry Dino** ★★★★★ (126) FREE

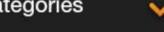


**Temple Run** ★★★★ (6859) FREE



**Bubble** Bugs **★★★★** (64) FREE











Board

Cards



Casual

Early Childhood



Croods



REE



ss The rd -...

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Star Girl: **Nails Salon** 

★★★★★ (33)



**Blackjack** 21 FREE ★★★★ (6146)



Subway Surfers (Ki... ★★★★★ (10801)



**Xtreme Motocross** ★★★★★ (104)









Search All Games



Library >

#### **All Games**

**All Categories** 

Refine

#### Sorted by Relevance



**WarGames:** WOPR **★★★★** (87) \$1.99



**Hungry Dino** ★★★★★ (126) FREE



**Temple Run** ★★★★ (6859) FREE



**Bubble** Bugs **★★★★** (64) FREE



Doodle Jump **★★★★** (218) FREE



**The Croods** ★★★★ (376) FREE



Star Girl: **Nails Salon** ★★★★★ (33)



Blackjack 21 FREE ★★★★ (6146)



Subway Surfers (Ki... ★★★★★ (10801)



**Xtreme Motocross** ★★★★★ (104)



**Diamond** Dash ★★★★ (464)



**Guess The** Word -... **★★★★** (485)





efine







## Search All Games



# Library >



#### Sorted by Relevance



Fruit Ninja Free





**CandySwipe** 2 FREE





Beach **Buggy Blitz** 





Ice Cream Truck:...





GameCircle

Everyone 10+

Educational

Everyone









Puzzles & Trivia

Racing



v Free









**Survival Run** with...

**★★★★** (96) FREE



**Angry Birds** Rio (...





Jetpack Joyride





**Boggle** (Kindle ★★★★ (103)

FREE



















Search Kids



Library >

**All Games** 

Kids

Refine

Sorted by Relevance



#### **Gymnastics Events**





**Cake Pop** Maker -





#### **Kids Doodle** - Movie Kids





#### **Baby Care &** Dress Up -





My Horse



FREE







Beck and Bo

**★★★★** (75) \$1.99



Jumping Finn Turbo -





Puppy Dog Sitter -





Littlest Pet Shop





**Movie Food Maker FREE** 





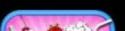
**Easter** Bunny

























< Apps

Search Appstore



Library >



Baby Care & Dress Up - Play, Love and Hav...

> TabTale LTD ★★★★★ (234)

> > FREE

## **Screenshots**





### Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed fed played with bathed read a bedtime story and put to











Library >



Baby Care & Dress Up - Play, Love and Hav...

TabTale LTD

★★★★ (234)

Get App

## **Screenshots**





### Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed, fed, played with, bathed, read a bedtime story and put to











Library >



Baby Care & Dress Up - Play, Love and Hav...

> TabTale LTD ★★★★★ (234)

> > Open

### **Screenshots**





### Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed fed played with bathed read a bedtime story and put to











Library >



Baby Care & Dress Up - Play, Love and Hav...

TabTale LTD

★★★★ (234)

Open

### **Screenshots**





### Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed, fed, played with, bathed, read a bedtime story and put to









Library >

## Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed, fed, played with, bathed, read a bedtime story and put to sleep. This is the most fantastic mommy's helper game ever! Dress Up Time! Dress up your baby in style: choose from dozens of hairstyles, outfits, dresses, jeans, silly pacifiers, accessories and toys! Feed Me! Your baby is hungry, it's time to feed her. Prepare the bottle and feed your baby her cereal and veggies. Tea Party! Surrounded by her dolls in her backyard, your baby is ready to eat cookies and drink tea. Mix up the tea and add sugar cubes. Don't forget to give her dolls drinks too. Bath Time! Get out the shampoo and soap, your baby is dirty. Wipe her clean with a sponge. Make the bubbles pop and play with her bath toys. Rinse her off with water when she's all clean. Time for Bed! After all the fun she had, your baby is getting sleepy. She wants a bottle and a bedtime story. All tucked in and ready for bed, choose from 3 books to read to her. PLEASE NOTE: This app lets you purchase digital content using actual money. You can configure parental controls for in-app purchases, which will require your Amazon account password or a 4-digit PIN, by going to the Settings menu from within the Amazon Appstore.

**Customers Who Bought This App Also Bought** 













# EXHIBIT B







Search Games



Library >

Games Action Arcade Casual Puzzles & Trivia All Games





**Top Free Games** 

See All



Guess The Movie ★★★★ (543) FREE



Hungry Dino ★★ ★★ (126) FREE



Bubble Bugs

★★★★ (64)

FREE



Temple Run 2

★★★★ (6858)

FREE



Salon ★★★★★ (33) FREE

Star Girl: Nails

# **Top Paid Games**

Scribblenauts Remix





Minecraft Pocket Edition

★★★★ (6723)

\$6.99



Plants vs.
Zombies

★★★★★ (1665)

\$0.99



Jumping Finn Turbo -...

\$0.99



See All

Cut the Rope

★★★★ (2599

















kids games



Library >

Games

All Categories

Refine

Sorted by Relevance



Animal Hide and S... ★★★★ (123)

FREE



Barnyard
Games f...

★★★★★ (2802)
FREE



Chuggingt... Train... ★★★★★ (97) FREE



Kids Doodle
- Mo...

★★★★★ (1027)

FREE



Preschool and Ki...

★★★★★ (366)

FREE



Free
Princess

★★★★★ (78)
FREE



Where's My Water... ★★★★ (3696) FREE



Awesome
Shape

\*\*\*\*\* (39)
FREE



Tap the Bubble:...

★★★★★ (123)
FREE



Yummy Burger ★★★★ (55) FREE

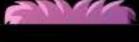


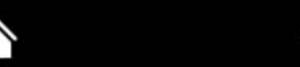
Road Warrior ★★★★ (1216) FREE



Awesome
Memory

\*\*\*\*\* (43)
FREE























Library >



# Animal Hide and Seek: Free Hidden Object Game for Kids

Absolutist Ltd

★★★★★ (123)

FREE

## **Screenshots**





# Description

Animal Hide and Seek is an absolutely free hidden object game for kids. Even the youngest children will get involved into the magic world of animation. The game has simple mechanics and doesn't require any language skills. This is a great tool that will help your kids to improve their creative thinking, dedication and imagination while kind and cheerful characters will make your child happy for hours. There are 12 African landscapes in the game and every time you start a new game, the animals hide in different locations. PLEASE NOTE: This app lets you purchase digital content using actual money. You can configure parental controls for in-app purchases, which will require your Amazon account password or a 4-digit PIN, by going to the Settings menu from within the Amazon



















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Absolutist Ltd

★★★★★ (123)

Get App

## **Screenshots**





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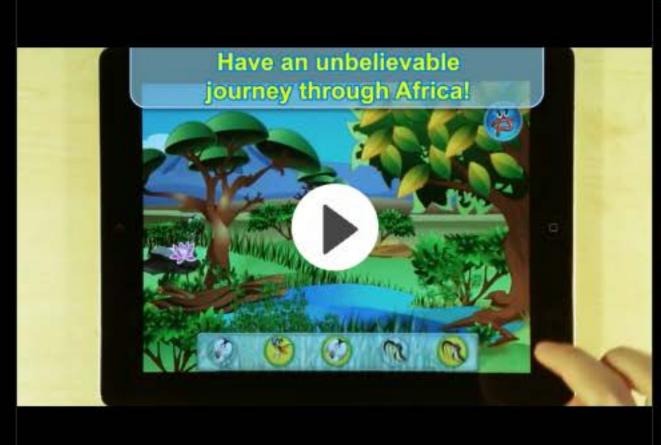


# Animal Hide and Seek: Free Hidden Object Game for Kids

Absolutist Ltd

Purchasing...

## **Screenshots**





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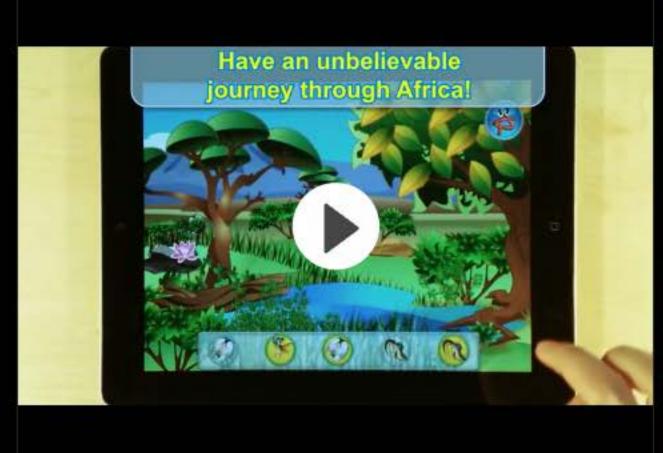
# Animal Hide and Seek: Free Hidden Object Game for Kids

Absolutist Ltd

**★★★★** (123)

Open

## **Screenshots**





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Unlocked



Volume Brightness



Wireless



Sync

More...



## **USB Cable Connected**



# Connected to Low-Power Charger

Your Kindle may not charge while in use. If you leave it connected, it will charge slowly while the device is asleep.

# Notification 1

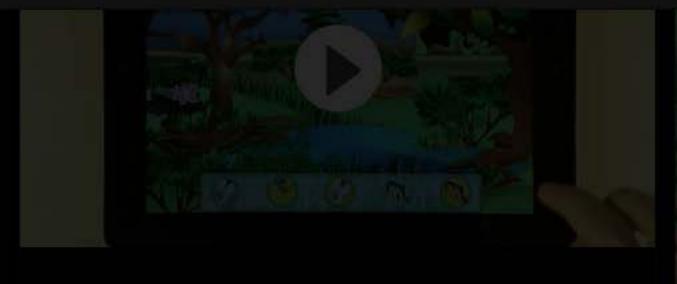
Clear All



Animal Hide and Seek: Free Hidden Object Ga.. Successfully installed.

Tap to launch.

4:13 PM





## Description

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# Animal Hide and Seek: Free Hidden Object Game for Kids

Absolutist Ltd

**★★★★** (123)

Open

## **Screenshots**





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Animal Hide and Seek is an absolutely free hidden object game for kids. Even the youngest children will get involved into the magic world of animation. The game has simple mechanics and doesn't require any language skills. This is a great tool that will help your kids to improve their creative thinking, dedication and imagination while kind and cheerful characters will make your child happy for hours. There are 12 African landscapes in the game and every time you start a new game, the animals hide in different locations. PLEASE NOTE: This app lets you purchase digital content using actual money. You can configure parental controls for in-app purchases, which will require your Amazon account password or a 4-digit PIN, by going to the Settings menu from within the Amazon



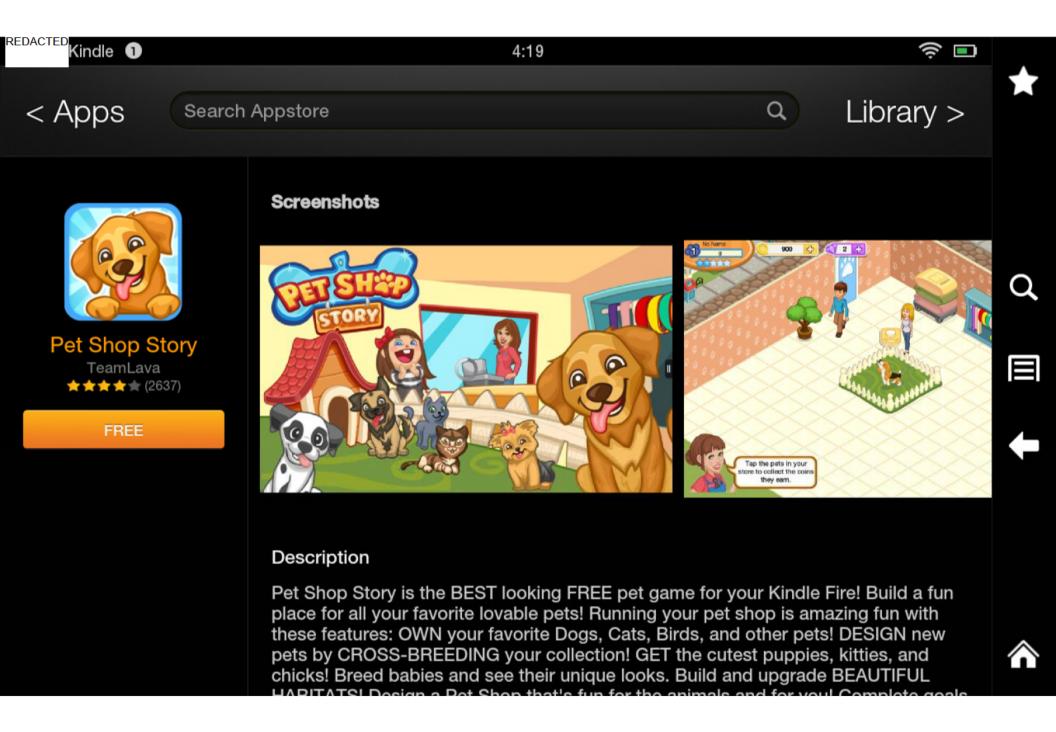








# EXHIBIT B











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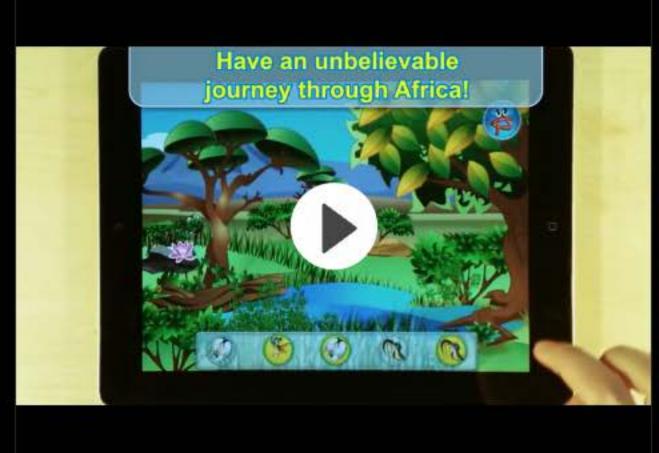
# Animal Hide and Seek: Free Hidden Object Game for Kids

Absolutist Ltd

★★★★★ (123)

FREE

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Library >



Baby Care & Dress Up - Play, Love and Hav...

TabTale LTD

★★★★ (234)

FREE

## **Screenshots**





### Description

Dress, Feed & Bathe your Baby - Have a Tea Party & Put your Baby to Bed! Play Mommy & Care for Adorable Babies, Hundreds of Outfits & Loads of Fun! Kids will Learn Responsibility - Don't Let the Babies Cry! Meet four adorable babies who can't wait to be dressed, fed, played with, bathed, read a bedtime story and put to











Library >



# Tap Dragon Park

Pocket Gems

★★★★★ (477)

FREE

Test Drive beta

## **Screenshots**





# Description

Hatch, raise and train magnificent dragons in Tap Dragon Park! Collect tons of adorable dragons and raise and train them with the help of wizards. Use your dragons to help guard your Kingdom's treasure and keep out the evil Trolls! Mix and match your dragons to discover more rare species. AWESOME FEATURES INCLUDE: - Collect TONS of rare and magnificent dragons! - TRAIN & GROW your dragons with the help of Wizards! - BATTLE evil trolls to protect your treasure! - Play for free, yes FREE, forever! Pocket Gems is the name behind Tap Paradise Cove, Tap Zoo, Tap Pet Hotel, and several other ridiculously fun free games. If you like dragon games like Dragonvale, Tiny Monsters, Dragon Story, Smurf's Village, Bakery Story, Fashion Story, Tap Fish, or Paradise Island, you'll love Tap Dragon Park! Please note that Tap Dragon Park is free to play, but you are able to purchase game items with real money. If yo 500 coins want to use this feature inlease disable in-ann nurchases Vo











# EXHIBIT C

